

# EXHIBIT 57

## MAO DECLARATION ISO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

DOCUMENT SOUGHT TO BE SEALED

## Message

**From:** Henry Wong [henrywong [REDACTED]]  
**Sent:** 8/27/2020 8:41:32 PM  
**To:** Christina Collada [cmcollada [REDACTED]]  
**CC:** Chris Jordan [chrisjordan [REDACTED]]; Jessica Lee [jsl [REDACTED]]; Ela Beres [eberes [REDACTED]]; Ankita Goel [aankita [REDACTED]]; Catherine Wu [catwu [REDACTED]]; JK Kearns [jkearns [REDACTED]]; David Monsees [davidmonsees [REDACTED]]; David Gatwood [gatwood [REDACTED]]; Shivani Gupta [shivanigu [REDACTED]]; Natalie Aizenberg [nataliea [REDACTED]]  
**Subject:** Re: Ondevice history cleanup

We do not want to show on-device history for users who have turned off WAA. IMO these users have given us a clear signal that they do not want Google to know what they are searching for. Technically we don't (it's on device) but I'm willing to bet that less than 1% of users will understand that; IMO it just feels like we are tracking them even though they told us not to.

On Thu, Aug 27, 2020 at 1:30 PM Christina Collada <cmcollada [REDACTED]> wrote:

Could you clarify what this means?

Specifically, we're working on approvals for launching Waa-off ondevice history for all modes of mobile web, and waa-off for all modes of iGA.

Does that mean removing ondevice history for users who have turned off WAA? Or adding ondevice history for users who've turned off WAA?

On Thu, Aug 27, 2020 at 4:26 PM Chris Jordan <chrisjordan [REDACTED]> wrote:

Hi all,

Wanted to communicate some work we're doing to unlaunch device history in two places this week.

- The first is for signed-in WAA-on for iGA (Rasta. "loggedin\_smh=1\_0" is signed in, waa-off -- "loggedin\_smh=1\_1" is signed in, waa on).
- The second is for signed-in WAA-on for mobileweb video mode (Rasta (most losses are in Video mode, but we should gain those back from Natalie's Video Mode launches).

This is a first step to a broader cleanup we're doing in this space, and we're starting with these two because they are ready to unlaunch now. We plan to have fast-follow work for WAA-off device history as well. Specifically, we're working on approvals for launching Waa-off ondevice history for all modes of mobile web, and waa-off for all modes of iGA.

Let me know if you have any questions, and as we progress I'll keep everyone posted.

Thanks.

c

--

Christina Collada | Google App Product Team